

AO 187 (Rev. 7/87) Exhibit and Witness List

UNITED STATES DISTRICT COURT

Northern

DISTRICT OF

Georgia

J.G.

Plaintiff's
EXHIBIT AND WITNESS LIST

V.

Northbrook Industries, Inc.

Case Number: 1:20-cv-05233-SEG

PRESIDING JUDGE Honorable Sarah E. Geraghty					PLAINTIFF'S ATTORNEY David Bouchard/Oto Ekpo/Pat McDono	DEFENDANT'S ATTORNEY Dana Richens/Audrey Smith
TRIAL DATE (S) 7/7/2025					COURT REPORTER Melissa Brock	COURTROOM DEPUTY Stephanie Pittman
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
1		7/8/25	✓	✓	Aerial photo of location of United Inn in metro Atlanta showing I-285 and I-75	
2			✓	✓	Aerial photo of location of United Inn showing Memorial Drive and I-285	
3			✓	✓	Aerial photo of United Inn with outline of property	
4			✓	✓	Aerial photo of United Inn with outline of property	
5			✓	✓	Aerial photo of United Inn and parking lot	
6			✓	✓	Photo from Memorial Drive of bus stop and United Inn	
7			✓	✓	Photo of front of United Inn	
8			✓	✓	Photo of United Inn front office and front of hotel	
9			✓	✓	Photo of United Inn sign on Memorial Drive	
10			✓	✓	Photo of side of United Inn	
11			✓	✓	Photo of side and back of United Inn	
12			✓	✓	Photo of United Inn back parking lot	
13			✓	✓	Photo of United Inn back parking lot	
14			✓	✓	Photo of United Inn back parking lot	
15					Photo of United Inn back parking lot	
16		7/8/25	✓	✓	Photo of United Inn back parking lot	
17					Extended Stay Hotels and Motels Intervention Strategy Steering Committee PPT, 9/2015 and busin	
18					HOTEL/MOTEL INTERVENTION Proposed Pilot, July 2016 and business records certification	
19		7/8/25	✓	✓	7/16/14 DeKalb PD police report and business records certification	
20					7/23/14 DeKalb PD police report and business records certification	
21					8/12/15 DeKalb PD police report and business records certification	
22					Backpage Homepage and business records certification	

* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

EUE ADS

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES	
23					8/26/15 DeKalb PD police report and business records certification	
24					6/2/17 DeKalb PD police report and business records certification	
25					6/20/17 DeKalb PD police report and business records certification	
26					7/21/17 DeKalb PD police report and business records certification	
27					3/24/19 DeKalb PD police report and business records certification	
28					4/8/19 DeKalb PD police report and business records certification	
29					9/27/19 DeKalb PD police report and business records certification	
30					Superior Court Case Summary, State of Georgia v. James Dionte Ruffin and business records cert	
31					10/22/19 DeKalb PD police report and business records certification	
32					1/8/20 DeKalb PD police report and business records certification	
33		7/8/25	✓	✓	9/27/19 email from Casey Benton to Tracy Benjamin and business records certification	
34					10/19 email chain involving Casey Benton and Grace Cho re Natalie Rivas and business records	
35					6/10/20 email from Detective PL Lopez and business records certification	
36					6/11/20 email involving Phillips Lopez re 20-044426 FI referral	
37					GBI Sex Offender Registry for United Inn & Suites with business records certification	
38		7/9/25	✓	✓	Photo of GW at United Inn	
39		7/9/25	✓	✓	Photo of GW at United Inn	
40					Photo of GW at United Inn	
41		7/9/25	✓	✓	Photo of GW at United Inn	
42		7/9/25	✓	✓	Photo of GW at United Inn	
43		7/8/25	✓	✓	4/28/17 Letter from DeKalb County PD to United Inn	
44					8/11/17 business record certification regarding GJ subpoena to United Inn / production from United	
45			✓	✓	11/14/17 email from Chief Sumlin to unitedinn4649@gmail.com re "Security Proposal" with attach	
46		7/8/25	✓	✓	Signed Hotel/Motel ordinance dated November 16, 2017	
47		7/8/25	✓	✓	Miscellaneous documents re human trafficking	
48		7/8/25	✓	✓	O.C.G.A. § 16-5-47; Posting model notice with human trafficking hotline information in businesses	
49					June 27, 2017 consent Agreement Order	

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50					Deferred sentencing order from Magistrate Court of DeKalb County (May 22, 2018) and check (Jur	
51					Receipt # 179349 from State Court of DeKalb County to United Inn & Suites (6/5/18)	
52					6/4/19 email chain with Tahir Shareef regarding business license renewal	
53		7/8/25	✓	✓	9/5/19 email from Tahir Shareef to Ashad Khan, Saara Consulting and business records certification	
54					4/25/18 email from Tahir Shareef to Muktar Ali and business records certification	
55					9/5/19 email from skusa85@yahoo.com to Muktar Ali with attachments and business records certifi	
56					Email from APD and APD re missing person Ashanti Walker with notice	
57					APD missing/runaway juvenile Nevaeh Williams	
58		7/8/25	✓	✓	10/29/18 email from Tim Wade to UnitedInn4649@gmail.com re "bolo J.G."	
59		7/8/25	✓	✓	10/29/18 email from Tim Wade to UnitedInn4649@gmail.com re "MISSING JUVENILE MAYBE AT	
60					10/29/18 email from Tim Wade to UnitedInn4649@gmail.com re "Missing Juvenile"	
61		7/9/25	✓	✓	11/14/18 police reports and business records certification	
62		7/9/25	✓	✓	11/14/18 trespass notice to Chimeko Grimes	
63		7/8/25	✓	✓	Summary chart of trespass notices produced by United Inn at NBI 000001-NBI 000623	
64		7/8/25	✓	✓	Text messages between Tahir Shareef and Officer Webber	
65					Text messages between Tahir Shareef and Officer Webber	
66					Text messages between Ashar Islam and Officer Webber	
67					2017 W-2 Wage and Tax Statements	
68					2018 W-2 Wage and Tax Statements	
69					2019 W-2 Wage and Tax Statements	
70					10/12/18 pay records for United Inn	
71					11/7/18 pay records for United Inn	
72					11/9/18 pay records for United Inn	
73					11/23/18 pay records for United Inn	
74					2/1/19 pay records for United Inn	
75					Undated Excel list of employee hours	
76					Paragraph lists of names of workers at United Inn	

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77					List of workers at United Inn with contact information	
78		7/8/25	✓	✓	Front desk schedule October – November 2018, January 2019	
79					Housekeeping schedule October 2018, November 2018, January 2019	
80					Jenorris Parker's certified criminal history	
81		7/8/25	✓	✓	Corita Watts's certified criminal history	
82					12/11/19 email from Tahir Shareef to Ashar Islam with subject, "Jenorris Letter"	
83		7/8/25	✓	✓	United Inn & Suites Total Management Summary, January 2018 – December 2018 and business r	
84					United Inn & Suites Management Audit Summary, January 2018 – October 16, 2018 and business	
85		7/8/25	✓	✓	United Inn & Suites Total Management Summary, January 2019 – December 2019 and business r	
86					United Inn & Suites Total Management Summary, January 2020 – September 2020 and business r	
87		7/8/25	✓	✓	Photo of NS at United Inn	
88		7/8/25	✓	✓	Photo of JG and NS at United Inn	
89		7/8/25	✓	✓	January 6, 2019 video of JG and NS at United Inn	
90					McDowell expert report	
91					McDowell resume	
92					CSE-IT Form	
93					CSE-IT validation report	
94					CSE-IT form (J.G.)	
95					Text Messages	
96		7/9/25	✓	✓	October 8, 2018 Photo of JG at United Inn	
97		7/8/25	✓	✓	October 16, 2018 Photo of JG at United Inn	
98		7/8/25	✓	✓	October 24, 2018 video of JG at United Inn	
99		7/8/25	✓	✓	October 25, 2018 video of JG at United Inn	
100		7/8/25	✓	✓	November 2, 2018 Text Message re Room 145 at United Inn	
101		7/9/25	✓	✓	November 14, 2018 DeKalb PD bodycam footage at United Inn	
102					Georgia Cares Assessment Summary, Jhordyn Grimes, 11/30/18	
103					House of Hope Case Plan, Jhordyn Grimes, 7/16/19	

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104					House of Hope Discharge Summary and Closing Report, Jhordyn Grimes, 2/3/20	
105					Coastal Pines Technical College Application, Jhordyn Grimes	
106					Children's Hospital of Atlanta Medical Records, Jhordyn Grimes, and business records certification	
107					Oakhurst Medical Center Medical Records, Jhordyn Grimes, and certification statement	
108					Coastal Community Health Services Medical Records, Jhordyn Grimes, and certificate of authentic	
109					United Behavioral Health Solutions Medical Records, Jhordyn Grimes, and certificate of authentic	
110					Amerigroup correspondence, Jhordyn Grimes	
111					Photo of United Inn hotel room	
112					Photo of United Inn hotel room	
113					Video walkthrough of United Inn lobby and front office	
114					Photos of United Inn office wall	
115					Photo of United Inn office wall	
116					Photo of United Inn office wall	
117					Photo of United Inn office wall	
118					Photo of United Inn office wall	
119		7/8/25	✓	✓	Photo of nighttime office window	
120					2/5/17 correspondence with Hope Atlanta	
121					2/7/17 correspondence with Hope Atlanta	
122					11/15/17 email from Kathy Laity re hotel-motel ordinance	
123					11/14/17 DeKalb County agenda regarding County Code	
124					1/3/18 email from United Inn	
125					1/10/18 email from Kathy Laity regarding hotel-motel ordinance	
126					1/30/18 email from Kathy Laity to United Inn	
127					Photo of United Inn rates and DeKalb County Ordinance	
128					Business License Renewal Affidavit – 2019 (DeKalb County Department of Planning & Sustainability)	
129					Renewal Request for Information – 2019 (DeKalb County Department of Planning & Sustainability)	
130					1/17/17 email attaching United Inn & Suites Rules and Regulations	

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131					United Inn & Suites Management Policies	
132					DeKalb PD Tucker Precinct Letter re Operation Safeguard and business records certification	
133					5/16/18 email from Suzanne Bold to Tahir Shareef re "Claim #G10045009"	
134					5/14/18 email from Tahir Shareef to Azfar Haque re "United Inn"	
135					Defendant's Witness List as part of pre-trial order	
136					Defendant's Initial Disclosures	
137		7/8/25	✓	✓	Defendant's Responses to 1st RFAs	
138					Defendant's Responses to 1st RPDs	
139					Defendant's Responses to 1st ROGs	
140					Defendant's Responses to 1st Supplemental RPDs	
141					Defendant's Responses to 1st Supplemental ROGs	
142					Defendant's Supplement to Initial Disclosures	
143					Defendant's Response to 1st Supplemental RFAs	
144					Defendant's Response to 2nd Supplemental RPDs	
145					Defendant's Response to 2nd Supplemental ROGs	
146					Defendant's Response to 3rd Supplemental RPDs	
147					2014-2019 Police reports from United Inn	
148					United Inn & Suites' privilege log	
149					DeKalb County Code Enforcement Case Inspection Detail (Feb. 23, 2021) and business records	
150					Dontavis Carr Room Receipt	
151					James Ruffin Room Receipt	
152					Bobby Spence Customer Receipt	
153		7/9/25	✓	✓	Chelsie Williams Customer Receipt	
154		↓	✓	✓	Raevyn Rustemeyer-Broncheau Room Receipt	
155		↓	✓	✓	Rebecca Faulks Room Receipt	
156					Certificate of Incorporation for North Brook Industries, Inc.	
157					Certificate of Amendment of the Certificate of Incorporation of North Brook Industries, Inc.	

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158					State of Georgia, Secretary of State, Annual Registration and business records certification	
159					Shareholder Agreement for Northbrook Industries, Inc., Sept. 6, 2005	
160					Consent and Assumption Agreement with Limited Release for Northbrook Industries, Inc.	
161					United Inn by laws	
162					Chaneyfield expert report	
163					Chaneyfield CV	
164					IAPSC Forensic Methodology	
165					DHS Blue Campaign Materials	
166					Vellani expert report	
167					Vellani CV	
168					North Brook Industries, Inc. Balance Sheet dated December 31, 2018	
169					Income Tax Return for an S Corporation, Northbrook Industries, Inc., 2017	
170					Income Tax Return for an S Corporation, Northbrook Industries, Inc., 2018	
171					Georgia Form 600S for Northbrook Industries, Inc., 2017-2018	
172					Sales and Use Summary Tax Forms for 2018, Northbrook Industries, Inc.	
173					United Inn and Suites Revenue and Expense Report for Twelve Months Ending December 31, 2018	
174					Georgia Form 600S for Northbrook Industries, Inc., 2018-2019	
175					Income Tax Return for an S Corporation for Northbrook Industries, Inc., 2020	
176					Federal Tax Return for Northbrook Industries, Inc., 2021	
177					Federal Tax Return for Northbrook Industries, Inc., 2021	
178					Certificate of Liability Insurance, Northbrook Industries, Inc., 6/29/15	
179					Certificate of Liability Insurance, Northbrook Industries, Inc., 8/1/16	
180					Certificate of Liability Insurance, Northbrook Industries, Inc., 8/25/17	
181					Certificate of Liability Insurance, Northbrook Industries, Inc., 7/23/18	
182					Certificate of Liability Insurance, Northbrook Industries, Inc., 7/18/19	
183					Certificate of Liability Insurance, Northbrook Industries, Inc., 7/30/20	
184					Certificate of Liability Insurance, Northbrook Industries, Inc., 8/9/21	

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